

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

9 DAPHNE P. RAND, by and through) Case No. CV 09-0639-SI
10 DEBRA L. DOLCH, as Conservator of)
the Person and Estate of DAPHNE P.)
11 RAND, Conservatee, on Behalf of) CLASS ACTION
12 Themselves and All Others Similarly)
Situated,) PROPOSED ORDER FOR AN AWARD
13 Plaintiff,) OF ATTORNEYS' FEES,
14 v.) REIMBURSEMENT OF EXPENSES
15 AMERICAN NATIONAL) AND SERVICE AWARD
16 INSURANCE COMPANY, a Texas)
corporation,)
17 Defendant.)
18) JUDGE: Hon. Susan Illston
DATE: September 22, 2011
TIME: 9:00 a.m.
CTRM: 10 – 19th Floor

20 Based on the submissions of the Parties, including their oral presentations at
21 the Final Approval Hearing, held on September 22, 2011, it is hereby ORDERED,
22 ADJUDGED AND DECREED AS FOLLOWS:

23 1. Class Counsel are hereby awarded attorneys' fees in the amount of
24 \$3,000,000.00, which the Court finds to be reasonable and fair. This amount
25 stipulated to in the Settlement Agreement as the Class Counsel Payment, covers
26 any and all claims for attorneys' fees and expenses incurred by any and all counsel
27 for Plaintiffs and the Class in connection with the settlement of the action and the

administration of such settlement. Such payment is to be provided by American National Life Insurance Company (“ANICO”) to Bonnett, Fairbourn, Friedman & Balint, P.C. within ten days of the Court’s entry of Judgment. Bonnett, Fairbourn, Friedman & Balint, P.C. shall be responsible for allocating and distributing the Class Counsel Payment among Class Counsel.

2. The Court awards the following service awards: (a) \$5000.00 to Debra L. Dolch as Special Administrator to the estate for legal fees and expenses and (b) \$15,000.00 to the Estate of Daphne P. Rand as Class Representative in the action. ANICO will pay the service award in addition to any benefits that Plaintiff is entitled to receive as a Class Member. ANICO will pay the service award within 15 days of the entry of Judgment.

SO ORDERED this ____ day of _____, 2011.

THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

Submitted by:

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& BALINT, P.C.
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